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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

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15 IN RE: CATHODE RAY TUBE (CRT)
16 ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

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19 This Document Relates to:
20 ALL DIRECT ACTION CASES
21

**STIPULATION AND
[PROPOSED] ORDER
REGARDING DISCOVERY TO
OCCUR AFTER SEPTEMBER 5,
2014**

1 Defendants Hitachi Ltd., Hitachi America, Ltd., Hitachi Electronics Devices (USA)
 2 Inc., Hitachi Asia Ltd., and Hitachi Displays, Ltd., (collectively, “Hitachi”) and the Direct
 3 Action Plaintiffs¹ (the “DAPs”) have conferred by and through their counsel and, subject to
 4 the Court’s approval, HEREBY STIPULATE AS FOLLOWS:
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6 WHEREAS, September 5, 2014, was the deadline to complete fact discovery.

7 WHEREAS, on September 5, 2014, this Court approved a stipulation between the
 8 parties that extended the deadline for the DAPs to take a Rule 30(b)(6) deposition of Hitachi
 9 until October 17, 2014.
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11 WHEREAS, the parties have continued to meet and confer to determine the scope and
 12 the date of a deposition. As part of that process, the DAPs submitted to Hitachi in writing the
 13 proposed questions that would be asked at the deposition, and Hitachi Ltd. has agreed to
 14 produce a witness for the deposition.

15 WHEREAS, due to scheduling conflicts between the witness and counsel, the parties
 16 were unable to find a date prior to October 17, 2014, on which to conduct the deposition.
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18 WHEREAS, the parties have agreed, subject to the Court’s approval, to conduct the
 19 deposition on November 4, 2014, at 1:00 PM local time at Kirkland & Ellis LLP’s office in
 20 New York.

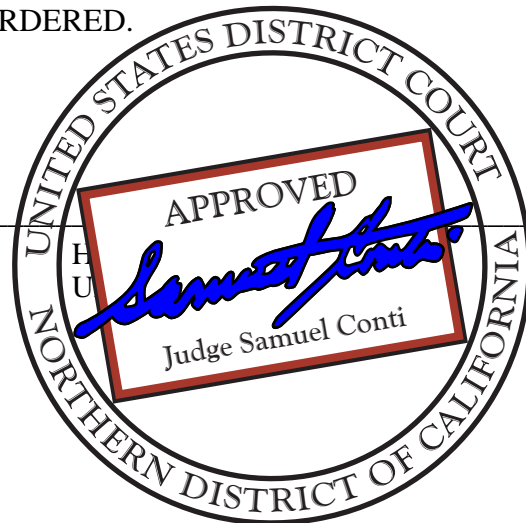
21 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 22 counsel of record, that:
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25 ¹ The Direction Action Plaintiffs are Electrograph Systems, Inc.; Electrograph Technologies, Corp.; Alfred H.
 26 Siegel (as trustee of the Circuit City Stores, Inc. Liquidating Trust); Best Buy Co., Inc.; Best Buy Purchasing LLC;
 27 Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; BestBuy.com, L.L.C.; Magnolia Hi-Fi, Inc.; Interbond
 28 Corporation of America; Office Depot, Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island
 Corporation; ABC Appliance, Inc.; MARTA Cooperative of America, Inc.; Schultze Agency Services, LLC,
 (on behalf of Tweeter Opco, LLC, and Tweeter Newco, LLC); Sears, Roebuck and Co. and Kmart Corp.; Target
 Corp., Sharp Electronics Corporation, Sharp Electronics Manufacturing Company of America, Inc., Tech Data
 Corporation, Tech Data Product Management, Inc., Dell Inc., and Dell Products L.P.

1 (1) the DAPs may conduct the Rule 30(b)(6) deposition of Hitachi Ltd. on November 4,
2 2014.
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11 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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14 Dated: October 22, 2014
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1 Dated: October 10, 2014

By: /s/ Eliot Adelson
Eliot Adelson, Esq.

*Counsel to Defendants Hitachi Ltd., Hitachi
America, Ltd., Hitachi Electronics Devices
(USA) Inc., Hitachi Asia Ltd., and Hitachi
Displays, Ltd.*

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19 Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this
20 document has been obtained from each of the above signatories.